

J Christopher Jorgensen
Nevada Bar No. 5382
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Tel: 702.949.8200
Fax: 702.949.8398
Email: cjorgensen@lewisroca.com

*Attorneys for Defendant Merck & Co, Inc., and
Merck Sharp & Dohme Corp.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SAVANNAH FLORES,

Plaintiff,

v.

MERCK & CO., INC., a New Jersey
Corporation; and MERCK SHARP & DOHME
CORP., a New Jersey Corporation,

Defendant.

Case No. 3:21-cv-00166-MMD-CLB

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO ANSWER
OR OTHERWISE PLEAD TO
PLAINTIFF'S COMPLAINT**

(FIRST REQUEST)

Pursuant to Local Rule IA 6-1 of the United States District Court for the District of Nevada, Defendants Merck & Co., Inc., and Merck Sharp & Dohme Corp. ("Defendants") and Plaintiff Savannah Flores ("Plaintiff"), by and through their respective counsel, (collectively the "Parties") hereby stipulate as follows:

1. Plaintiff filed her Complaint on April 9, 2021;
2. Defendants were served with the Complaint on May 19, 2021;
3. Defendants' deadline to answer or respond to Plaintiff's Complaint is June 9, 2021;
4. Defendants have requested, and Plaintiff has consented to, an additional three week extension for Defendants to file an Answer or otherwise plead to the Complaint;

1 5. The additional three week extension for Defendants to answer or respond to
2 Plaintiff's Complaint will not alter the date of any event or deadline already fixed by the Court or
3 prejudice any party;

4 6. Good cause exists to grant the stipulation as the additional three weeks are needed
5 to allow Defendants to complete its investigation of Plaintiff's allegations, including a review of
6 all relevant documents;

7 7. Pursuant to Civil Local Rules 6.2 and 7.1, Plaintiff and Defendants have agreed
8 that Defendants shall have up to and including July 2, 2021, to file a responsive pleading to
9 Plaintiff's Complaint.

10 8. WHEREAS, this is the first request by the Parties seeking such extension;
11 THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY
12 STIPULATED AND AGREED by and between the Parties as follows:

13 Defendants Merck & Co., Inc. and Merck Sharp & Dohme Corp., shall have up to and
14 including July 2, 2021, to file an Answer or Otherwise Plead to Plaintiff's Complaint.

15 ...

16 ...

17 ...

18 ...

19 ...

20 ...

21 ...

22

23

24

25

26

27

28

1 **IT IS SO STIPULATED.**

2 Dated this 28th day of May 2021.

3 BAUM, HEDLUND, ARISTEL & GOLDMAN PC

LEWIS ROCA ROTHBERGER CHRISTIE LLP

4 By: /s/ Bijan Esfandiari

By: /s/ J Christopher Jorgensen

5 Bijan Esfandiari, Esq.
6 Michael L. Baum, Esq.
7 Nicole K.H. Maldonado, Esq.
8 10940 Wilshire Blvd., 17th Floor
9 Los Angeles, CA 90024

J Christopher Jorgensen, Esq.
Nevada Bar No. 8352
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169

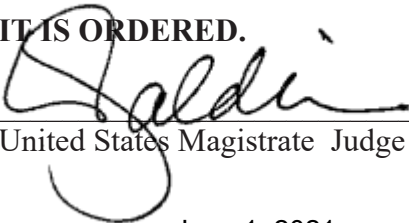
*Attorney for Defendants Merck & Co., Inc.,
and Merck Sharp & Dohme Corp.*

8 Melanie A. Hill, Esq.
9 Melanie Hill Law PLLC
10 1925 Village Center Circle, Suite 150
11 Las Vegas, NV 89134

12 Robert F. Kennedy, Jr.
13 Children's Health Defense
14 1227 N. Peachtree Pkwy, Suite 202
15 Peachtree City, GA 30269

*Attorney for Plaintiff
Savannah Flores*

16 **IT IS ORDERED.**

17 
18 United States Magistrate Judge

19 DATED: June 1, 2021